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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
SOUTHERN CALIFORNIA,

Plaintiff,

v.

UNITED STATES IMMIGRATION
AND CUSTOMS ENFORCEMENT,
UNITED STATES DEPARTMENT
OF HOMELAND SECURITY,

Defendants.

Case No. 2:22-cv-04760-SHK

**JOINT STIPULATION TO AMEND
BRIEFING SCHEDULE ON THE
PARTIES' CROSS-MOTIONS FOR
SUMMARY JUDGMENT
REGARDING DEFENDANTS
DEPARTMENT OF HOMELAND
SECURITY AND DEPARTMENT
OF HOMELAND SECURITY
OFFICE OF INSPECTOR
GENERAL**

Honorable Shashi H. Kewalramani
United States Magistrate Judge

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IT IS HEREBY STIPULATED, by and between Plaintiff American Civil Liberties Union Foundation of Southern California and Defendants Department of Homeland Security (“DHS”) and DHS Office of Inspector General (“DHS-OIG”) (collectively “Defendants”), through their counsel, and subject to an order of this Court as follows:

1. Pursuant to the Court’s December 21, 2023 Scheduling Order, Dkt. No. 64, on February 23, 2024, Plaintiff filed its Motion for Summary Judgment against Defendants DHS and DHS-OIG (“Plaintiff’s Motion”).

2. In originally calculating the word count, counsel for Plaintiff inadvertently failed to count the words in the footnotes, resulting in an undercount of words they certified as being in Plaintiff’s Motion.

4. To remedy the matter, Plaintiff’s counsel offered to Defendants’ counsel to file an amended Motion for Summary Judgment that complies with the word count limit of Local Rule 11-6.1, and extend the briefing schedule to ensure Defendants would not be prejudiced by the late filing of Plaintiff’s Amended Motion.

5. Undersigned Defendants’ counsel agreed to this resolution of the matter, and the Parties agreed on the following proposed amended schedule for the above-referenced Parties’ Cross-Motions for Summary Judgment, to supersede the schedule set forth in the Court’s December 21, 2023 Scheduling Order, Dkt. No. 64.

Deadline for Plaintiff to File Motion for Summary Judgment against DHS and DHS-OIG	March 1, 2024
Deadline for Defendants DHS and DHS-OIG to File Cross Motion for Summary Judgment and Opposition Brief	March 27, 2024
Deadline for Plaintiff to File Opposition and Reply Briefs	April 17, 2024
Deadline for Defendants DHS and DHS-OIG File Reply Brief	May 1, 2024
Hearing on Cross-Motions	May 15, 2024 at 10:00 a.m., or at the convenience of the Court

IT IS SO STIPULATED.

Dated: February 29, 2024

Respectfully submitted,

HOQ LAW APC

/s/ Laboni A. Hoq
LABONI A. HOQ

Attorneys for Plaintiff American Civil
Liberties Union Foundation of Southern
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Dated: February 29, 2024

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* Pursuant to Local Rule 5-4.3.4(2)(i), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.